

Wiregrass Medical Center  
1200 W. Maple Avenue  
Geneva, Alabama 36340

SELMAN CRYSTAL D  
479251 MITCHUM O D MD  
DOB-03/09/70 33 MALE  
00/00/00

OP-SURG

PLAINTIFF'S  
EXHIBIT

Blumberg No. 5113

15a

## CONDITIONS FOR TREATMENT

1. **MEDICAL AND SURGICAL CONSENT FOR TREATMENT:** The undersigned hereby authorizes WIREGRASS MEDICAL CENTER to furnish the necessary treatment, surgical procedures, anesthesia, x-ray examinations or treatments, drugs and supplies as may be ordered or requested by the attending physician(s). The undersigned acknowledges that no guarantee or assurance has been made as to the results of treatment, surgery or examinations in the hospital. The undersigned recognizes that all physicians furnishing services to the patient may be independent contractors and are not employees or agents of the Hospital.
2. **RELEASE OF INFORMATION:** The undersigned hereby authorizes WIREGRASS MEDICAL CENTER to release to any insurers, their representatives or other third parties confidential information (including copies of records) relative to this hospitalization. This authorization includes, but is not limited, to the release of information relating to drug, alcohol and/or psychiatric treatment as specified in Federal Regulation 42, CFR part 2. I further authorize any physician or institution that attended the patient previously to furnish medical records or information which may be requested by the Hospital or attending physicians.
3. **RELEASE FROM LIABILITY FOR VALUABLES:** I have been made aware the WIREGRASS MEDICAL CENTER provides facilities for the safe keeping of my valuables and therefore, I release the Hospital from any responsibility due to loss or damage of my clothing, money, jewelry, or other items of value that I might keep at my bedside, or that may be brought to me by my friends and relatives.
4. **GUARANTOR AGREEMENT:** The undersigned agrees, whether he signs as agent or patient, that in consideration of the services to be rendered to the patient, he hereby individually obligates himself to pay the account of the Hospital in accordance with the regular rates and terms of the Hospital. Should the account be referred to an attorney for collection, the undersigned shall pay reasonable attorney's fees and collection expense. All delinquent accounts bear interest at the legal rate.
5. **ASSIGNMENT OF INSURANCE BENEFITS:** In the event the undersigned and/or patient is entitled to Hospital benefits of any type whatsoever arising out of any insurance policy or any other party liable to the patient, such benefits are hereby assigned to WIREGRASS MEDICAL CENTER for application to the patient's bill. It is agreed that the Hospital may receipt for any such payment and such payment will discharge the said insurance company of all obligations under the policy to the extent of such payment. The undersigned and/or patient agrees to be responsible for charges not paid by this assignment.

THE UNDERSIGNED CERTIFIES THAT HE HAS READ OR HAD THE FOREGOING INFORMATION EXPLAINED, HAS RECEIVED A COPY, AND IS THE PATIENT OR IS DULY AUTHORIZED BY THE PATIENT AS PATIENT'S GENERAL AGENT TO EXECUTE THE ABOVE AND ACCEPT ITS TERMS.

Date 12-17-02 Witness Andrea Boyce Signature Kayla Johnson Patient

Patient's Agent or Representative

Relationship to Patient

### ASSIGNMENT OF MEDICARE BENEFITS: PATIENT CERTIFICATION, AUTHORIZATION TO RELEASE INFORMATION, AND PAYMENT REQUEST

"I certify that the information given by me in applying for payment under title XVIII of the Social Security Act is correct. I authorize any holder of medical or other information about me to release to the Social Security Administration or its intermediaries or carriers any information needed for this or a related Medicare claim. I request that payment of authorized benefits be made on my behalf. I assign the benefits payable for physician services or authorize such physician or organization to submit a claim to Medicare for payment to me. I understand that I am responsible for Part A deductible for each spell of illness, the Part B deductible for each year, the remaining 20% of reasonable charges and any personal charges incurred."

Date \_\_\_\_\_ Signature \_\_\_\_\_ Relationship to Patient \_\_\_\_\_

### ACKNOWLEDGEMENT OF MEDICARE

I hereby declare I am a participant in the Medicare Program and I am not enrolled in a health maintenance organization, (H.M.O.), or any other pre-paid group practice. I understand that if it is found that I am a participant in any of the above mentioned practices, I will be considered a self-pay patient required to pay in full immediately.

Date \_\_\_\_\_ Signature \_\_\_\_\_ Relationship to Patient \_\_\_\_\_

## EMERGENCY ROOM • OUTPATIENT RECORD

PATIENT NUMBER 479251	TYPE 2	PATIENT NAME SEAMAN CRYSTAL D			AGE 33	BIRTHDATE 3/09/1970	SEX M	H/S MW	DATE OF SERVICE 12/19/03		TIME 09:00	CLERK INIT. SCJ
ADDRESS - LINE 1 28045 BEULAH CH ROAD			ADDRESS - LINE 2			CITY OPP		STATE AL	ZIP CODE 36467	TELEPHONE 334-858-5904		
PATIENT SSAN 236150086		NOTIFY IN CASE OF EMERGENCY - NAME SEAMAN ROBERT			RELATIONSHIP SP		ADDRESS SAME	SAMSON AL		TELEPHONE 334-858-5904		
INSURANCE COMPANY NATIONAL SECURITY					CONTRACT OR GROUP NUMBER 226150086			DATE		PLACE		
								TIME		EVENT		
GUARANTOR NAME SEAMAN CRYSTAL D			GUARANTOR ADDRESS 28045 BEULAH CH ROAD			CITY OPP		STATE AL	ZIP CODE 36467	GUAR. TELEPHONE 858-5904		
GUARANTOR EMPLOYER STUDENT MCARTHUR TECH			GUARANTOR OCCUPATION STUDENT			GUAR. EMPLOYER ADDRESS			GUAR. EMPL TELEPHONE			
PREV. SERVICE 467551	PREV. SERV. DATE 6/02/03	IF MINOR - PARENT NAME					MED. REC. # 236150086	ADMITTING/2ND PHYSICIAN MITCHUM O /BERANEK ST				
CHARGES	X-RAY	LAB	RESP. TH.	PHY. TH.	EKG	I.V.	DRUGS	SUPPLIES	OTHER	M.D.	E.R. RM	TOTAL DUE

## AUTHORIZATION FOR TREATMENT, GUARANTEE OF PAYMENT, ASSIGNMENT OF INSURANCE BENEFITS

1. The undersigned has been informed of the emergency treatment considered necessary for the above named patient, and that treatment and procedures will be performed by physicians, members of house staff and employees of the hospital. Authorization is hereby granted for such treatment and procedures. The undersigned has read the above authorization and understands the same and certifies that no guarantee or assurance has been made as to the results that may be obtained.
2. The undersigned agrees to pay for services rendered by Hospital upon release of patient.
3. I/we hereby assign any hospital benefits, sick benefits, injury benefits due to a liability of a Third party, payable by any party, for the above patient, to Hospital unless I pay the account in full upon release of patient.
4. I/we hereby authorize the "Administrator of Hospital" to furnish from its records any information requested by the before mentioned insurance companies in connection with the above assignment. I do hereby appoint the "Controller" of Hospital as my lawful attorney to endorse for me any checks made payable to me for benefits or claims collected under the above assignment and to apply any credit balance to any other account I may owe said hospital.

DATE TIME SIGNED  
PATIENT SIGNER  
GUARANTOR

CHIEF COMPLAINT (If Accident State How, When, and Where)

TEMP.	PULSE	RESP.	B/P	ALLERGIES	MEDICATIONS - HOME			E.R. PHYSICIAN	TET. TOX.
-------	-------	-------	-----	-----------	--------------------	--	--	----------------	-----------

NURSES NOTES:

NURSE'S SIGNATURE (RN OR LPN)

LAB DATA (Including X-Rays, EKGs, etc.)

PHYSICIAN'S REPORT

28  
28

PLAINTIFF'S EXHIBIT  
15b

## DIAGNOSIS:

TREATMENT:

	CONDITION ON DISC
	IMP STABLE EXPIRED

INSTRUCTIONS TO PATIENT:

FOLLOW-UP WITS

M.D.

PATIENT'S SIGNATURE ON DISCHARGE  
I HEREBY CERTIFY THAT I UNDERSTAND THE FOLLOW-UP  
INSTRUCTIONS INSTRUCTED BY ME IN WRITING, WHICH WERE EXPLAINED TO ME.

DATE - TIME OF DISC.

PHYSICIAN'S SIGNATURE

4/2

WIREGRA MEDICAL CENTER  
1200 W. MAPLE AVE.  
GENEVA, AL 36340

HISTORY AND PHYSICAL

Patient Name: SEAMAN CRYSTAL D	Number: 479251	Admit Date: 00/00/00
Sex: M Age: 33	Med Record: 236150086 MR	Disc. Date: 00/00/00
Date of Birth: 03/09/1970	Type: O/P Room#:	Physician: MITCHUM O D MD
		Physician Number: 000700

CHIEF COMPLAINT: ELBOW PAIN

HISTORY: MS. SEAMAN IS A 33 YEAR-OLD WHITE FEMALE WHO HAS PAIN IN HER RIGHT ELBOW, UNIMPROVED WITH CONSERVATIVE TREATMENT WHO PRESENTS FOR ELECTIVE SURGICAL CARE. SHE HAS AN ULNAR NEUROPATHY AT THE ELBOW AND PRESENTS FOR ULNAR NERVE TRANSPOSITION. SHE GIVES A HISTORY THAT ON APRIL 25, 2003, SHE WAS COMING OUT OF THE PIGGLY WIGGLY IN FLORALA, HER BUGGY WHEEL HIT A POT HOLE AND TRIED TO FLIP. SHE FELL AND INJURED HERSELF. SHE HAS HAD PAIN EVER SINCE THAT TIME. SHE UNDERWENT ELECTRODIAGNOSTIC STUDIES WHICH SHOWED A TARDIVE ULNAR NERVE PALSY. SHE HAS SYMPTOMS OF PAIN, NUMBNESS AND TINGLING AND WEAKNESS. SHE PRESENTS FOR ELECTIVE RIGHT ELBOW ULNAR NERVE TRANSPOSITION.

PAST MEDICAL HISTORY:

ALLERGIES: NONE KNOWN.

MEDICATIONS: LORTAB FOR PAIN ON AN AS NEEDED BASIS.

PAST SURGERIES INCLUDE A TUBAL LIGATION IN 1991.

FAMILY HISTORY IS NEGATIVE FOR DIABETES, CANCER AND HEART DISEASE.

SOCIAL HISTORY: SHE IS CURRENTLY A STUDENT. SHE ADMITS TO SMOKING A PACK PER DAY. SHE IS MARRIED AND LIVES IN OPP, ALABAMA.

REVIEW OF SYSTEMS: UNREMARKABLE.

PHYSICAL EXAMINATION: MS. SEAMAN IS 5'9", 260 POUNDS AND APPEARS IN GOOD HEALTH.

HEENT IS BENIGN.

LUNGS ARE CLEAR TO AUSCULTATION.

HEART IS REGULAR RATE AND RHYTHM WITHOUT MURMUR.

ABDOMEN IS SOFT, BENIGN, NON TENDER.

EXTREMITIES: RIGHT ELBOW - SHE HAS FULL RANGE OF MOTION AT THE ELBOW. SHE IS EXQUISITELY TENDER PROXIMALLY ON THE ULNAR SIDE OF THE ELBOW JUST BELOW THE LIGAMENT OF STRUTHERS. SHE HAS A POSITIVE TINEL'S THERE AND A POSITIVE PHALEN SIGN WITH DECREASED SENSATION IN THE RING FINGER DISTALLY. SHE IS NOTED TO HAVE INTACT MOTOR STRENGTH, SENSATION AND PULSES DISTALLY WITH THE EXCEPTION OF THE SMALL FINGER.

IMPRESSION: RIGHT ELBOW ULNAR NEUROPATHY.

PLAN: ADMISSION FOR ELECTIVE RIGHT ELBOW ULNAR NERVE TRANSPOSITION. SHE ACKNOWLEDGES UNDERSTANDING OF THE DIAGNOSIS, SURGERY, INDICATIONS, ALTERNATIVES, RISKS AND COMPLICATIONS WHICH INCLUDE BUT ARE NOT LIMITED TO PAIN, SCAR, BLEEDING, INFECTION, FURTHER SURGERY, FAILURE TO RELIEVE HER SYMPTOMS AND ANESTHETIC RISKS. SHE WISHES TO PROCEED WITH SURGERY.



STEVE BERANEK, M.D.

DATE DICTATED: 12/19/03

DATE TYPED: 12/19/03/8:37 A.M./md



PLAINTIFF'S  
EXHIBIT  
**159**

Blumberg No. 5113

**WIREGRASS MEDICAL CENTER**  
**NURSING INTERVIEW AND ASSESSMENT**

Admission Date: <u>12-14-03</u>	Information for Interview Obtained From:
Admission Time: <u>0900</u>	Patient <input checked="" type="checkbox"/>
Mode of Arrival: <input checked="" type="checkbox"/> Amb <input type="checkbox"/> Stretcher <input type="checkbox"/> W/C	Other (Name) _____
ID Bracelet: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Relationship _____
Height <u>5' 10"</u> Weight <u>250</u>	Apical / Radial
BP <u>137/86</u>	Irregular <input type="checkbox"/> Regular <input checked="" type="checkbox"/>
Pulse <u>77</u>	Respirations <u>20</u>
Temp. <u>97.2</u>	Oral / Rectal / Ax / Ear
Chief Complaint _____	
_____	
_____	
_____	

Information for Interview Obtained From:

Patient 

Other (Name) \_\_\_\_\_

Relationship \_\_\_\_\_

Drugs: NKAFood: NKALatex: NKA

Other: \_\_\_\_\_

**ORIENTATION TO ROOM:** Nurse Call Light Side Rail Policy Electric Bed Telephone Meal Time Bathroom Television Roommate

YES NO

**PROSTHESIS:**Dentures  Upper  Lower

Removable Bridge

Artificial Eye

Contact Lens

Glasses

Hearing Aid  Right  Left

Pacemaker

Artificial Limb

Brace

Anything Artificial in Body

**SELF-MEDICATION / VALUABLES RESPONSIBILITY**

Signing here I acknowledge that I have informed of the Wiregrass Medical Center's rule against self-medication and I state that I have no medication in my possession and will not seek to obtain any while I am a patient in this hospital. I also agree to comply with Wiregrass Medical Center's Policy concerning disposition of valuables.

**SMOKING RESPONSIBILITY**

I have also been informed of the smoking regulations and state that I will adhere to Wiregrass Medical Center's Policy.

*Christie Johnson*  
Patient or Next of Kin

12-17-03

Date

**MEDICATIONS:  LOCKED UP  SENT HOME****PERSONAL DATA & HISTORY**

Name	Dosage	Frequency	Last Taken
OTC Allergy - Sinus			

Herbs	Locust 5 mg every 4 hrs as needed
-------	-----------------------------------

Vitamins	
----------	--

Surgical History	
------------------	--

When	What
1991	BTL

Previous Medical History	
--------------------------	--

Cancer	<input type="checkbox"/> <input checked="" type="checkbox"/> When
--------	---

Liver Disease / GI	<input type="checkbox"/> <input checked="" type="checkbox"/>
--------------------	--

Hepatitis	<input type="checkbox"/> <input checked="" type="checkbox"/>
-----------	--

Problems With Anesthesia	<input type="checkbox"/> <input checked="" type="checkbox"/>
--------------------------	--

Sickle Cell Anemia	<input type="checkbox"/> <input checked="" type="checkbox"/>
--------------------	--

Blood / Bleeding Disorders	<input type="checkbox"/> <input checked="" type="checkbox"/>
----------------------------	--

Infectious Disease	<input type="checkbox"/> <input checked="" type="checkbox"/>
--------------------	--

Last Flu Vaccine	<input type="checkbox"/> <input checked="" type="checkbox"/>
------------------	--

Last T.T. Vaccine	<input checked="" type="checkbox"/> <input type="checkbox"/> 3003
-------------------	---

Last Pneumonia Vaccine	<input type="checkbox"/> <input checked="" type="checkbox"/>
------------------------	--

Diabetes	<input type="checkbox"/> <input checked="" type="checkbox"/>
----------	--

**FAMILY HISTORY - STATE WHO**

YES	NO	Who
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	mother
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	father; grandfather
<input type="checkbox"/>	<input checked="" type="checkbox"/>	father, grandfather black lung
<input checked="" type="checkbox"/>	<input type="checkbox"/>	father

**SPIRITUAL / CULTURAL NEEDS**Advanced Directives  Yes  No Copy on file if YesReligious Preference ChristianOrgan Donor  Yes  NoOther Spiritual / Cultural Needs  Yes  No

If Yes explain: \_\_\_\_\_

Signature:

*Moni Collins Jr.*

*Seaman*

*1330*

Wiregrass Medical Center  
1200 West Maple Avenue  
Geneva, Alabama 36340  
(334) 684-3655 Extension 4652  
Outpatient Surgery Department

Discharge Instructions  
General Surgery / EGD / Colonoscopy

Follow-up Doctor's Appointment Date: 12-22-03 Time: 9:00 AM

Activity: Rest quietly today. Have a responsible adult be with you the rest of the day. Children should be watched for the next 24 hours. Do not drive a car or operate machinery for 24 hours. Have someone with you if you smoke. You should not drink alcoholic beverages while taking pain medicine. You may return to work when released by M.D.

Diet: Take clear liquids such as tea, soups, and sodas. Progress slowly to soft foods as tolerated; then resume a normal diet.

Medications: Continue home medications.

Rx: Lortab 10 one every 4 to 6 hrs as needed.  
If possible take medication with toast, crackers or some type of solid food.

Wound Care: Keep dry & until you see Dr. Beranek on Monday. Keep arm in comfortable position & may elevate with pillow for comfort. Keep arm in current position without If any of the following should occur or any other complications occur call: Dr. 1-888-351-2663 Bending at \_\_\_\_\_ If unable to contact a Doctor go to the Emergency Room Dr. Beranek

- Lung congestion or wheezing
- Nausea or vomiting that continues 12 hours after you return home.
- Temperature above 100 degrees
- Difficulty urinating
- Severe abdominal pain
- Excessive bleeding
- Signs of infection- redness, drainage, foul odor.
- Poor circulation- tingling, numbness, skin discoloration.
- EGD: Difficulty swallowing, spitting up bright red blood
- Colonoscopy: Rectal bleeding

The above instructions have been explained to me. I understand these instructions

*Xabbi Seaman*  
Signature

Date

12-19-03



CRYSTAL D  
HITCHCOOK NO  
MALE

Wiregrass Medical Center  
Outpatient Surgery Unit Discharge Criteria

Yes      No      Discharge Criteria

<input checked="" type="checkbox"/>	Swallow, cough, gag reflexes present	
<input checked="" type="checkbox"/>	Absence of respiratory distress	
<input checked="" type="checkbox"/>	Vital signs stable	
<input checked="" type="checkbox"/>	Alert, oriented	
<input checked="" type="checkbox"/>	Nausea, vomiting, dizziness minimal	
<input checked="" type="checkbox"/>	Bleeding, drainage minimal	
<input checked="" type="checkbox"/>	Taking fluids PO	
<input checked="" type="checkbox"/>	Voided	
<input checked="" type="checkbox"/>	Dressing checked	
<input checked="" type="checkbox"/>	Ambulatory	
<input checked="" type="checkbox"/>	Given instructions and prescription	
<input checked="" type="checkbox"/>	Transportation home	
<input checked="" type="checkbox"/>	Hep lock or IV removed	
<input checked="" type="checkbox"/>	Pain free or minimal	Pain Scale: _____

## Discharge Summary

D/C per Doctor's order

Dr. BeaneDate: 12-19-03 At: 1325 By: Mrs. Collins Jr.

Via: Amb W/C Stretcher

To: Home Relative's House Hospital Room

Accompanied By: Son

Patient Instructions Given: Yes No Other

Nature: Dr. Brown (allergies)

# Wiregrass Medical Center

## PATIENT TEACHING / DISCHARGE PLANNING

47451-47CRH100DHD  
007-0370070 33 MALE  
00/00/00

### MULTIDISCIPLINARY PLAN OF CARE

#### NURSING ACTION

DATE I.D.	NEED	DATE TO BE ACCOMPLISHED	INITIAL / DATE COMPLETED
12-4-03	INSTRUCTION SHEET AND FOLLOW-UP APPT. GIVEN	D/C	12-4-03 NC
12-17-03	reog instructions given; verbiage understandable		12-17-03 NC

#### DIETARY ACTION

DATE I.D.	NEED	DATE TO BE ACCOMPLISHED	INITIAL / DATE COMPLETED

#### PHYSICAL THERAPY ACTION

DATE I.D.	NEED	DATE TO BE ACCOMPLISHED	INITIAL / DATE COMPLETED

#### RESPIRATORY CARE ACTION

DATE I.D.	NEED	DATE TO BE ACCOMPLISHED	INITIAL / DATE COMPLETED

#### CASE MANAGEMENT ACTION

DATE I.D.	NEED	DATE TO BE ACCOMPLISHED	INITIAL / DATE COMPLETED

#### OTHER

DATE I.D.	NEED	DATE TO BE ACCOMPLISHED	INITIAL / DATE COMPLETED

WIREGRASS MEDICAL CENTER**Billing Form**

For Financial Class:

GB5

Patient Name..... SEAMAN, CRYSTAL D. Discharge Date..... 12/19/2003  
 Admission Date..... 12/19/2003 Date of Birth..... 03/09/1970  
 Medical Record Number..... 236150086 Sex..... Male  
 Age..... 33  
 Account Number..... 479251

<u>DX</u>	<u>Code</u>	<u>DX Description</u>
1	354.2	Ulnar Nerve Lesion

<u>PR</u>	<u>Code</u>	<u>PR Description</u>	<u>Procedure Date</u>	<u>Surgeon</u>
1	04.6	Transposition of Cranial/Peripheral Nerve	12/19/2003	6400
2	04.3	Suture of Cranial/Peripheral Nerve	12/19/2003	6400

<u>CPT</u>	<u>Code</u>	<u>CPT Modifiers</u>	<u>CPT Description</u>	<u>CPT Date</u>	<u>CPT Surgeon</u>	
		<u>APC</u>	<u>PSI</u>	<u>Payment Rate</u>	<u>ASC Group</u>	<u>ASC Fee</u>
1	64718		Revise Ulnar Nerve At Elbow	12/19/2003	6400	
		0220	T	351.19	2	392.47
2	64857	<u>CPT Modifiers</u>	<u>CPT Description</u>	<u>CPT Date</u>	<u>CPT Surgeon</u>	
			Repair Arm/Leg Nerve	12/19/2003	6400	
		<u>APC</u>	<u>PSI</u>	<u>Payment Rate</u>	<u>ASC Group</u>	<u>ASC Fee</u>
		0221	T	955.87	2	196.24

Attending Physician..... MITCHUM O D MD

Consulting Physician..... 6400

Discharge Disposition..... 01 - Home

DRG =

Status.....

DRG

MDC Weight AMLOS GMLOS LOS



Ed Benak M.D.

Medical Director

TIME: 13:00

Wiregrass Medical Center

01D0304961

File 06/02/2006

CLIA Number

H5LACUMV

## LABORATORY --- CUMULATIVE REPORT

NAME.: SEAMAN CRYSTAL D

SEX.....: M

PHY..: MITCHUM O D MD

ACCT#: 479251

AGE.....: 33 Y

ADMIT:

ROOM.: O/P

- NO PENDING ORDERS

DOB.....: 03/09/1970

MR#.: 236150086

PAT. PHONE: 3348585904

## HEMATOLOGY

12/17/03

1610

		REFERENCE
		RANGE UNITS
WBC	9.1	4.3 - 11.0 K/uL
RBC	4.36 L	4.60 - 6.20 M/uL
HEMOGLOBIN	13.4 L	14.0 - 18.0 gm/dL
HEMATOCRIT	38.9	38.0 - 56.0 %
MCV	89.2	80.0 - 94.0 fL
MCH	30.8	26.0 - 33.0 pg
MCHC	34.5	31.0 - 36.0 gm/dL
PLATELETS	309	150 - 375 k/uL
RDW	12.8	10.2 - 15.5 %
MPV	8	7 - 10 fL
NEUTROPHILS%	70	50 - 87 %
LYMPHOCYTES%	22	16 - 46 %
MONO%	6.7	5.5 - 11.7 %
EO%	1	0 - 2 %
BA%	1	0 - 1 %
NEUTROPHILS#	6.3	1.5 - 7.1 K/uL
LYMPHS#	2.0	.8 - 2.8 K/uL
MONO#	0.6	.3 - .8 K/uL
EO#	0.1	.0 - .2 K/uL
BA#	0.1	.0 - .1 K/uL
DIFF	NOT INDICATED	



OPERATIVE REPORT

Patient Name: SEAMAN CRYSTAL D	Number: 479251	Admit Date: 00/00/00
Sex: M	Med Record: 236150086 MR	Disc. Date: 00/00/00
Date of Birth: 03/09/1970	Type: O/P	Physician: MITCHUM O D MD
	Room#:	Physician Number: 000700

---

DATE OF PROCEDURE: 12/19/03

PREOPERATIVE DIAGNOSIS: RIGHT ELBOW ULNAR NEUROPATHY

POSTOPERATIVE DIAGNOSIS: SAME

OPERATIVE PROCEDURE: RIGHT ELBOW ULNAR NERVE TRANSPOSITION

SURGEON: STEVE BERANEK, M.D.

ANESTHESIA: GENERAL ANESTHETIC; FRANK VANLANDINGHAM; CRNA

BLOOD LOSS: MINIMAL

TOUNNIQUET TIME: 45 MINUTES AT 210 MILLIMETERS OF MERCURY

FLUIDS: A LITER OF PLASMALYTE

INDICATIONS: ADULT WHITE FEMALE WITH ELECTRODIAGNOSTIC RIGHT ELBOW ULNAR NEUROPATHY, WHO PRESENTS FOR ULNAR NERVE TRANSPOSITION.

DESCRIPTION OF PROCEDURE: FOLLOWING ADEQUATE GENERAL ANESTHETIC, THE RIGHT ARM WAS PREPPED WITH DURAPREP AND DRAPED IN THE USUAL STERILE FASHION. THE TOUNNIQUET AT THE BICEP WAS INFLATED AT 210 MM OF MERCURY. A 4 INCH INCISION WAS PLACED ALONG THE POSTERIOR BORDER OF THE ELBOW. THE SUBCUTANEOUS TISSUES WERE DISSECTED DOWN TO THE ULNAR NERVE PROXIMALLY. IT WAS EASILY IDENTIFIED. AS IT WAS FOLLOWED UP INTO THE ARM, TO THE LIGAMENTOUS STRUTHERS IT WAS NOTED TO BE QUITE TIGHT. THIS WAS FREED. THE NERVE WAS THEN CIRCUMFERENTIALLY FREED DISTALLY ALL THE WAY TO THE INSERTION AT THE FLEXOR DIGITORUM PROFUNDUS MUSCLE. IT WAS THEN TRANSPOSED ANTERIORLY INTO THE SUBCUTANEOUS AREA AND THEN THE FATTY TISSUE WAS SEWN OVER THE COMMON FLEXOR ORIGIN WITH 2-0 VICRYL SUTURE. THE NERVE WAS NOTED TO BE FREE AND FLOW THROUGH THIS LITTLE TUNNEL WITHOUT DIFFICULTY. THERE WAS AN ADDITIONAL SUPERFICIAL NERVE WHICH WAS TRANSECTED IN THE DISSECTION WHICH WAS REPAIRED WITH A SINGLE 4-0 NYLON SUTURE. THE SKIN WAS CLOSED WITH SUBCUTANEOUS 2-0 VICRYL SUTURE, SUBCUTICULAR 2-0 VICRYL SUTURE AND THEN REINFORCED WITH STERI-STRIIPS. A STERILE NON OCCLUSIVE DRESSING WAS APPLIED, THE TOUNNIQUET DEFlated AND HER FINGERS PINCHED UP NICELY. SHE WAS TAKEN TO OUTPATIENT RECOVERY IN GOOD CONDITION.

STEVE BERANEK, M.D.

DATE DICTATED: 12/19/03

DATE TYPED: 12/19/03/11:13 A.M./md

PLAINTIFF'S  
EXHIBIT

Bloomberg No. 5113

15j

Wiregrass Medical Center  
Brief Postop Note

Pre-op Diagnosis:

Right elbow ulnar neuropathy

Post-op Diagnosis:

Saint

Procedure:

Right elbow ulnar nerve transposition

Specimens:

NileEstimated Blood Loss: 10 cc Blood Given - Type: \_\_\_\_\_ Total: \_\_\_\_\_ ccFluid Type: Plas Fluid Total: 1000 cc

Drains: \_\_\_\_\_

Type of Anesthesia: General maskSurgeon: Dr Steven Belonek MDAnesthesia Provider: Fish Vanlandingham CRNA

Assistant: \_\_\_\_\_

Scrub #1: Bob Kisa Pridgen ORT

Scrub #2: \_\_\_\_\_

Circulating RN: Jane BlalockSRBench 10:35.15

Signature

12/19/03  
Date / Time

Bloomberg No. 5113

PLAINTIFF'S  
EXHIBIT  
15K

O.R. # 2 Date: 3/18/05

Chart Checked By: <u>J. Blackmon</u>	Time: <u>0935</u>		
Pre-Op Check List:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Pre-Op Check List:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Surgical Consent	<input checked="" type="checkbox"/>	I.D. Band/Verbal	<input checked="" type="checkbox"/>
CBC	<input checked="" type="checkbox"/>	Consult	<input type="checkbox"/>
Urinalysis	<input type="checkbox"/>	Blood Available	<input type="checkbox"/>
X-Ray	<input type="checkbox"/>	History & Physical	<input checked="" type="checkbox"/>
EKG	<input type="checkbox"/>	Allergies <u>MIA</u>	<input type="checkbox"/>

Pre-Op Assessment: 137/66 B P 77 P 97 T 20 R  
 Response Level: Alert  
 Physical Status: H  
 Skin Condition: warm & dry

Arrived OR 0945 Departed OR 1040  
 Anesthesia Start 0950 Anesthesia End 1040  
 Surgery Start 1005 Surgery End 1035

Position: Supine Safety Belt  Yes  No  
 Supine   
 Prone   
 Lithotomy   
 Lateral   
 Knee-Chest   
 Other   
 Cautery Unit # F101304847 Repositioned all extremities  
 Pad: 76205 Supported supported  
 Probe:  Rectal  Oral  Skin Dot

EKG Leads: LA  LL  RA  RL  
 Cautery Setting: Blend 2  
 Coagulation: 30

Tourniquet Site: \_\_\_\_\_ Pressure \_\_\_\_\_ MM of Hg  
 Time Up \_\_\_\_\_ Time Down \_\_\_\_\_

Arrived with: Foley  Output \_\_\_\_\_  
 NG  Output \_\_\_\_\_

Inserted: Foley \_\_\_\_\_ Size: F cc of Balloon Fluid \_\_\_\_\_  
 Time: \_\_\_\_\_ By Whom: \_\_\_\_\_  
 Output: \_\_\_\_\_ Removed:  Yes  No  
 Total Output: \_\_\_\_\_ Quality: \_\_\_\_\_

LV. Fluids: Accepted Prep: \_\_\_\_\_  
 Type: Plast Site: Abdomen Total: 1000 Started By: Seeng notes

Opsite  Yes  No Needle ga. 20

Blood/Components: Estimated Blood Loss: 1000

Skin Prep: Gamma Prep Clip/Shave  Yes  No  
 Irrigation: N2

Wound Drains: Location/Size \_\_\_\_\_  
 T-Tube  Chest Tube  Vacuum  Sump  Penrose

Medications: Time Site/Route By \_\_\_\_\_  
Anesthesia Record Fi

Packing/Dressing: Adaptic, 4x4's, Kerlix +  
ACE

Anesthesia: MD: L. Blackmon CRNA: \_\_\_\_\_

General  Regional Block  Local/MIVS

CRISTAL D  
 KITCHUM O D ND O/P  
 DUC-03/09/70

WIREGRASS MEDICAL CENTER

Pre-op Diagnosis: Right elbow ulnar neuropathy  
 Operation: Right elbow ulnar nerve transposition

Post-op Diagnosis: None

Wound Class: 1 Comment: \_\_\_\_\_

Surgeon: MR. STEVEN KELANER MD  
 Assistant: Lisa Bridges DO

1st Scrub: Lisa Bridges DO 2nd Scrub: \_\_\_\_\_  
 Relief: \_\_\_\_\_ Time: \_\_\_\_\_  
 Circulator: Joni Blackmon Time: \_\_\_\_\_  
 Other Personnel: \_\_\_\_\_

Sponge Ct.	Original	Added	Total
Laps	<u>10</u>	<u>6</u>	<u>16</u>
Raytec	<u>10</u>	<u>0</u>	<u>10</u>
Peanuts	<u>0</u>	<u>0</u>	<u>0</u>
Needle Ct.	<u>2</u>	<u>1</u>	<u>3</u>
Blade Ct.	<u>1</u>	<u>0</u>	<u>1</u>
Inst. Ct.	<u>MA</u>	<u>0</u>	<u>MA</u>

1st Count Correct  Yes  No Signature: JB/LD  
 2nd Count Correct  Yes  No Signature: JB/LD  
 3rd Count Correct  Yes  No Signature: JB/LP  
 4th Count Correct  Yes  No Signature: \_\_\_\_\_

If unresolved - X-ray Taken:  Yes  No \_\_\_\_\_  
 Circulator: Joni Blackmon Scrub: Lisa Bridges DO

Post-op Condition Alert  Asleep  Drowsy   
 Arousalable  Disoriented  Other \_\_\_\_\_  
 Skin Condition: WTF Cautery Pad Site: Abdomen Redness

Transferred To:  R.R.  ICU  Floor  O.P. Bay  Discharged

By:  Stretcher  Bed  Wheelchair  Ambulatory

Nurses Notes: 1040 Procedure completed well. Moved self to stretcher SRT 1040 to OPS 8 AM after ESR. 913-92-20 139/57 SBP 9470 in RH - KOOLSDT + reported to Linque Busman in 1003

Family Notified: 1003  
 Aldrete: G @ 1040  
 Specimen: None at site and correct + verified None

Temp: 98.6 Humidity: 21%

Scheduled  Emergency

PLAINTIFF'S EXHIBIT 15L

Blumberg No 5113

## WIREGRASS MEDICAL CENTER

## ANESTHESIA RECORD

Geneva, Alabama

PLAINTIFF'S  
EXHIBIT

15m

Blumberg No. 5113

Page No.

Anesthetist

Surgeon(s)

Age 53 Wt 250 Ht 5'10" Hg 134 Hct 38.9

B/P 114/74 Pulse 82 Resp 20 Temp 97.2

Pre Op Meds Bradycardia, Diuretic

Allergies N.E.L. Teeth Natural

Operation: Right Elbow Ulnar Nerve Transposition Date: 12/19/03

Hour: AM PM 15 30 45 1600 15 30 45 15 30 45 Totals Times

TECHNIQUE	O <sub>2</sub> L/MIN	4-13-2-1-7-7-7												Start Anesthesia			
I.V.	N <sub>2</sub> O L/MIN	13-7												1950			
SPINAL	Hypothalamic	6-5-0-0												End Anesthesia			
LOCAL	SUPRACO.	10-2-0												15			
REGIONAL	SUPERFIC.	8												200			
INHALATION	PIPERACETAM													1040			
SEMI-CLOSED														Start Operation			
CLOSED														1000			
NON REBRE.														1005			
MASK														End Operation			
ENDOTRAC														Urine			
ORAL SIZE														Blood Loss			
NASAL														15-0-35			
VIA TRACH														Placed ECG-mon			
LUBRICANT														W/ fourth pt			
CUFF														States R elbow			
PACK																	
INDUCTION																	
SMOOTH																	
EXCITEMENT																	
HYPOKSIA																	
EMPTING																	
L-SPLASH	Urine Output																
B-SPLASH	Blood Loss																
BP DROP		START	B.P.	220													
BP RISE	OP	V	A	200													
POSITION	END	ANES.	0	PULSE													
SUPINE	Drip	START	ANES.	X													
PRONE	---	---															
LITHOTOMY																	
JACK KNIFE	RESPIRATION																
SITTING	Start	ANES.	X														
LATERAL	Respirations																
ARMS OUT	Spont	0	S														
ARMS TUCKED	Assist	0	A														
EYES TAPEO	Cont	0	C														
ELBOWS PADDED	Vent	V															
WARMING PAD																	
EXTUBATION																	
SMOOTH																	
DIFFICULT																	
EMPTING																	
L-SPLASH	Monitors:																
MONITORS	Ven T. V./Cm H <sub>2</sub> O																
BP CUFF	Axill	FIC <sub>2</sub>															
PRECORDIAL	Rectal	SaO <sub>2</sub>															
ESOPH	F. Head	ETCO <sub>2</sub>															
SKG	Esoph	Temp															
PULSE OXIMETER																	
IV																	
O <sub>2</sub> MON																	
PIO <sub>2</sub>																	
ETCO <sub>2</sub>																	
TEMP																	
NERVE STIM																	
AGENT																	
Tourniquet																	
LEG																	
MMHG																	
1234																	
DQIP CHECK																	
READY FOR																	
INDUCTION																	
1951																	
Maint. of Airway	Mask	Oral	Nose														
Ett No.	Cuff	c/s	Air														
B.B.S.	SCCA	NRB															
Pre Anes Notes:	Spinal—Epidural—IV A Site Size																
	Level																
	Heat/Moist Exch Humidifier																
	Warmers: Blanket Fld/Blood Bath																
	Status at Close: Awake Arousalable No Response Reflexes																
	B/P 139/57 P 92 R 20 SaO <sub>2</sub> 94																
	Received by: Diane Black RN																
	Alderete 94/1040																
	Temp. 96.3																

**Wiregrass Medical Center****ANESTHESIA EVALUATION RECORD**

Date: 12/18/03 Time: 1100 a.m. / p.m. Allergic To: NKA  
 Age: 33 Sex: M Ht: 5'10 Wt: 230 Physical Status 1 ECG 3 BP 137/76 P 77 R 20 Temp: 97.2  
 Diagnosis: Vulvar nerve neuropathy  
 Proposed Surgery: Right Elbow Ulnar Nerve Transposition  
 Previous Surgery: BTL

Anesthesia Complications: \_\_\_\_\_  
 Food / Drink Intake past 8 hours: NPO Pregnant: BTL  
 Medications: Fortamet Fortabs Dentition / Airway: Natural  
 Cardiovascular: decent  
 EKG: N/M Chest X-Ray: N/M  
 Lungs: Asthma  
 Tobacco: 1/2 2-3 yrs pks/day/yr Alcohol: occ Diabetes: decent  
 Liver: decent Kidneys: dx stones  
 GI: dx ulcer  
 Musculoskeletal / Nervous System: H/H  
 Endocrine: decent  
 Other: \_\_\_\_\_

Lab Date: Hgb: 13.4 Hct: 38.9 WBC/Platelets: 9.1 / 309 PT/PTT: \_\_\_\_\_ Urine: \_\_\_\_\_  
 SMA6: Na: \_\_\_\_\_ K: \_\_\_\_\_ Cl: \_\_\_\_\_ CO<sub>2</sub>: \_\_\_\_\_ BUN: \_\_\_\_\_ Glucose: \_\_\_\_\_ Creatinine: \_\_\_\_\_ Calcium: \_\_\_\_\_  
 ABG: pH: \_\_\_\_\_ pCO<sub>2</sub>: \_\_\_\_\_ PO<sub>2</sub>: \_\_\_\_\_ O<sub>2</sub>sat: \_\_\_\_\_ Addictions: \_\_\_\_\_  
 Other Lab: \_\_\_\_\_ Blood Available: \_\_\_\_\_

Summary of Preoperative Condition: smoker overweight asthma

Anesthesia Proposed: IV Sed QA - mask

**POST ANESTHESIA SUMMARY**

Date: 12/19 Time: 1400 QA-man 006  
 Condition: \_\_\_\_\_  
 Complications: VS stable but ran  
deep good sedation  
OC fine

Date: 12/19/03 Time: 0900

There is no contraindication to anesthetic and surgery. My choice for anesthesia for this surgical procedure is: IV Sed QA-man

Appleton M.D.

Appleton  
 Signature (Anesthesia Department)



Patient Name <i>DRYSUM Smith</i>	Document 27-16 Filed 06/02/2006	Page 15 of 32
SS#	DOB <i>3-29-70</i>	
Phone	Prescription #	
Scheduled Date & Time		
Physician Signature <i>M. B. Smith</i>		Date

**OUTPATIENT PHYSICIAN ORDERS**Diagnosis  
(essential for registration)

STAT & CALL RESULTS		SEND RESULTS BY COURIER		Imaging Services						
FAX TO PHONE #		SEND RESULTS BY MAIL		ULTRASOUND		C.T.	CONTRAST Y N	NUCLEAR MEDICINE		
<b>Laboratory</b>				ABD	ABD			BONE		
AMYLASE	LIPID PROFILE	RA PROFILE		ARTERIAL	HEAD			HIDA		
ANA	HEPATIC PANEL	RA TEST		BREAST	PELVIS			THYROID		
B12 / FOLATE	MONO TEST	SED. RATE		CAROTID	L.S.					
CALCIUM	PHENOBARBITAL	SGOT		ECHO	C.S.					
X CBC	POTASSIUM	TEGRETOL LEVEL		PELVIS						
CHOLESTEROL	PREGNANCY, Urine	THEOPHYLLINE		VENOUS						
CULTURE from...	PREGNANCY, Serum	THYROID PROFILE								
DEPAKOTE LEVEL	BASIC METABOLIC PANEL	TRIGLYCERIDES								
DIGOXIN LEVEL	COMPREHENSIVE METABOLIC PANEL	LITHIUM								
DILANTIN LEVEL	PROTHROMBIN TIME	URINE CULTURE								
GLUCOSE	PSA	URINALYSIS								
Hgb A1C	PTT									
OTHER, as follows...				X-RAY						
				L	R		L	R		
						ANKLE		HUMERUS		
						CLAVICLE		FEMUR		
						CHEST		G.I.		
						ELBOW		FINGER		
						FOOT		TOE		
						FOOT & ANKLE		KNEE		
						FOREARM		PELVIS		
						HAND		SHOULDER		
						HIP		WRIST		
						LUMBAR SPINE		CERVICAL SPINE		
						MAMMOGRAM		TIB-FIB		
<b>Respiratory Care</b>				OTHER, as follows...						
ABG	PULMONARY FUNCTION TESTING									
PULSE OXIMETRY SPOT CHECK										
OTHER, as follows...										
				BASIC						
				COMPLETE						
	WITH	BRONCHO-DILATOR								
	WITHOUT									
				<b>Cardiology &amp; Neurological Services</b>						
				EKG	GXT	GXT w/THALLIUM				
				HOLTER	2-D ECHO	2-D COLOR DOPPLER				
				EEG	STRESS ECHO					
				OTHER, as follows...						
<b>Physical Therapy</b>				<b>Misc. Additional Orders and/or Diagnosis</b>						
EVALUATE & TREAT	PROSTHETIC TRAINING		WHIRLPOOL / WOUND CARE							
MODALITIES	TENS UNIT		STRENGTHENING / ROM EX							
GAIT TRAINING	TRACTION									
OTHER, as follows...										

Plaintiff's  
Exhibit  
150

**PHYSICIAN'S ORDERS**

**WIREGRASS MEDICAL CENTER**  
 1200 W. MAPLE AVE.  
 GENEVA, AL. 36340  
 334-684-3655

Drug Allergies

NKA

NAME: Crystal Seaman CRN  
 ROOM NO.  
 (ADDRESS)  
 HOSP. NO.

PHYSICIAN:

Date & Time	Another brand of drug identical in form and content may be dispensed unless checked <input type="checkbox"/>	DO NOT USE THIS SHEET UNLESS A RED NUMBER SHOWS <b>→</b>	Nurse's Initials
Admit 12/19/03	Dr. Barrett		
	Asc (P) elbow ulnar neuropathy		
	Soe (P) elbow ulnar nerve transposition		
	NPO		
	Another to NPB on call to OR		ABG
12/19	Benadryl 100 mg po		
0600	Razipan 20 mg po		
	Leotrix 40 mg po		
	IV PCA 100 cc/lbg		
	VO Dr. B. <del>Halligan</del> Halligan CRNA		
	Noted 12/19/03 - 0900 - A. BURTON R CNOR		
12/19/03	Postoperative orders to Ortho Surgery then Discharge per protocol		
	Good condition, native vital signs, regular dt, Up ad lib, Slight pain		
	Aspirin 200mg IV Q 1H PAIN RELIEF		
	Latitude or Peritoneal IR PO QUITA PAIN RELIEF		
	Amoxicillin 500mg po qid		
	12/19/03 C 1055		





## Diagnosis: Preoperative Nursing Care Plan

Date: 10/10/2013 Page 1 of 1

## Patient Care Plan

## Diagnosis: Postoperative Nursing Care Plan

Date: 10-11-1970 C.R. No. 33 RALE  
10-11-1970 33 RALE

## Patient Care Plan

## Intraoperative Care Plan

## Nursing Care Plan

00/00/00  
MALE  
33 D MD  
09/70 03/09/03  
4473231 MITCHUM D  
CRYSTAL D  
SEAGRAM O/P

PLAINTIFF'S  
EXHIBIT  
15s

**Nurses Notes**Date: 12/19/03Hospital Day: 1**24 Hour Shift Assessment**

Diet:	Type	Amount
Breakfast:		
Lunch:		
Dinner:		

Shift:	Night:		Day:		Evening:		PRN & Single Dose Medications (other than for pain)																
	Normal	Abnormal See NN	Normal	Abnormal See NN	Normal	Abnormal See NN																	
<b>Neurological:</b>																							
Pupils																							
Motor																							
LOC																							
Other																							
<b>Cardiovascular:</b>																							
Pulses																							
Nailbeds																							
Edema																							
Skin																							
Other																							
<b>Respiratory:</b>																							
Respirations																							
Cough / Sputum																							
Breath Sounds																							
Other																							
<b>GI / GU:</b>																							
Abdomen																							
Bowel Sounds																							
Urine																							
Other																							
<b>Emotional Needs</b>																							
Licensed	Night:																						
Personnel	Day:																						
Signature	Evening:																						
Patient Teaching	Yes	No	Yes	No	Yes	No																	
Care Plan Update	Yes	No	Yes	No	Yes	No																	
Charge Nurse:																							
Night RN:	<u>A. BURGESS RN CNA R</u>																						
Day RN:	<u>A. BURGESS RN CNA R</u>																						
Evening RN:																							
Evening																							
Day																							
Night																							
	Call Bell	Side Rails	ID Band	Restraints	Circulation	Check q 2 hr	Type of Bath	Shave	TED Hose	Foley Care	Skin Care	ROM	Ambulate	Chair	Bedrest	Turn q 2 hr	ADL / Individual	Assist	See Attached	Flowsheet	BMs per Shift	Signature / Initials	

Wiregrass Medical Center

## Vital Signs Flow Sheet

Date: 12/4/03

Received From: ONE BLOCK RD

1325

Respiratory Status: slight tachypnoea

Mental Status: Drowsy

Skin: (1) 4 D

Dressing: Day to Right arm

## Assessment

Pain Scale: Site None Rate —

IV Site: Hb and Vena Rate: 75

Total Amount present fluid 1000cc

Total Fluid Volume

$$C^{(n)} = S^{(n)} \cup$$

Wiregrass Medical Center  
Pre-Operative Checklist

Date: 12/19/03Allergies: N/A

T 97<sup>2</sup> P 77 R 20 B/P 137/66 Wt 250 Time 0900 AB  
Initials

Identification band on: Yes / No   Addressograph with chart:   

Removed: Glasses /  
Dentures /  
Jewelry /  
Nail Polish /

Chewing gum /  
Bobby pins /  
Contacts /  
Prostheses /

Ted hose N/A (if ordered)

A.M. Care: Bath /  
Care of hair /  
NPO since midnight /

Oral hygiene /  
Hospital gown on /  
Void prior to pre-op /  
Meds /  
Time / Initials

Care plan initiated: yesOperative permit signed and witnessed: yesSite/Side of surgery identified: yesHistory and Physical on chart:   

Laboratory results on chart:

UA	PT/PTT		
HGB	<u>13.4</u>	HCT	<u>38.9</u>
Type and			
Crossmatch			
Other			

Chest X-ray on chart:   EKG on chart:   

Pre-op medications given:

<u>Benadryl 100 mg</u>	<u>PO</u>	<u>1 0900</u>	<u>AB</u>
Medication		Time	Nurse
<u>Kefzal 20 mg PO</u>	<u>PO</u>	<u>1 0900</u>	<u>AB</u>
Medication		Time	Nurse
<u>Doktorin 46 mg PO</u>	<u>PO</u>	<u>1 0900</u>	<u>AB</u>
Medication		Time	Nurse
<u>Hincole 4 gm IVAB 0930</u>	<u>IV</u>	<u>1 0930</u>	<u>AB</u>
Medication		Time	Nurse
		<u>1</u>	<u>1</u>
Medication		Time	Nurse

Operative area prepped by:   Operative area checked by:   , RNPre-op teaching done: yesCharge Nurse: J. W. Dunson RN CNOR

PLAINTIFF'S  
EXHIBIT

15v



## WIREGRASS ORTHOPAEDICS, P.C.

STEVEN R. BERANEK, M.D.  
Board Certified Orthopaedic Surgeon  
519 E. Lee St., P.O. Box 311345, Enterprise, AL 36331  
Office 334-347-9590 1-888-351-2663 FAX 334-393-1762



## Pre-Registration for Surgery

Patient Name: Crystal D. Seaman D.O.B.: 3/9/70

OUTPATIENT PROCEDURE: Re/bw ulnar nerve transposition

NOTE TO PATIENT: Your procedure is scheduled for 12/19/03  
at Wiregrass Medical Center in Geneva, Alabama..

Your pre-admission assessment with the nurse in the Outpatient Surgery Department is  
scheduled for 12/17/03 3:30 pm.

Go to the Registration Desk in the front of the hospital where the admission clerk will ask  
you for this form which will alert her to the necessary steps you need to take and she will  
direct you where to go from there. It is important that you keep this appointment and  
complete the necessary procedures the nurse has for you which will help to ensure you of  
a safe and efficient visit to the Surgery Department. If you are unable to keep the time or  
date of the appointment, please notify the Outpatient Surgery Department at 334-684-  
3655 ext. 4652 in order to reschedule before your surgery date.

INPATIENT PROCEDURE: \_\_\_\_\_

NOTE TO PATIENT: Your procedure is scheduled for \_\_\_\_\_  
at Wiregrass Medical Center in Geneva, Alabama.

Your pre-admission assessment with the nurse in the Outpatient Surgery Department is  
scheduled for \_\_\_\_\_

Go to the Registration Desk in the front of the hospital where the admission clerk will ask  
you for this form which will alert her to the steps you need to take and she will direct you  
where to go to from there. It is important that you keep this appointment and complete  
the necessary procedures the nurse has for you which will help to ensure you of a safe and  
efficient visit to the Surgery Department. If you are unable to keep this appointment,  
please notify the Outpatient Surgery Department at 334-684-3655 ext. 4652 in order to  
reschedule before your surgery date.

You have an appointment with Dr. \_\_\_\_\_ on \_\_\_\_\_  
at \_\_\_\_\_ for a pre-operative  
clearance for surgery. If you are unable to keep this appointment, please call his office at  
\_\_\_\_\_ to reschedule before your surgery date.



Wiregrass Medical Center  
1200 West Maple Avenue  
Geneva, Alabama 36340  
(334) 684-3655  
Outpatient Surgery Department  
Ext. 4652

FOLLOW THESE INSTRUCTIONS CAREFULLY

Your Surgery or Procedure is Right elbow, ulnar nerve, transposition

Your Surgery or Procedure is scheduled for Friday Dec. 19<sup>th</sup>, 2003

Please arrive at the hospital no later than \_\_\_\_\_ a.m. *We will call you a time to come on Thursday. If you have not heard from us by 3PM please call us.*

Report to the Admissions' office in the emergency room area.  
Have an available person to drive you home. You cannot be allowed to leave the hospital alone.  
PLEASE limit your visitors during your stay. Rest is essential following your surgical procedure.

Do not eat or drink anything after midnight. If you are having an EGD or Colonoscopy do not eat or drink red colored foods or foods containing red dye 24 hours prior to procedure.

Do not wear makeup, nail polish, or jewelry.

Wear comfortable clothing.

Bring no valuables.

Take a betadine shower in the morning before coming to the hospital. Apply all over EXCEPT face and hair. Rinse all of the betadine off your body.

Special Instructions:

---

---

Our discharge procedure is the following:

You will be stable, awake and able to drink fluids without being nauseated and able to urinate.

If you need to cancel your surgical procedure for any reason, please call the outpatient department or the emergency room.

I have read and fully understand these instructions.

PATIENT'S SIGNATURE C. Michael S. German

SUBSTITUTE'S SIGNATURE

RELATION

NURSE'S SIGNATURE

DATE

THANK YOU FOR ALLOWING US TO CARE FOR YOU!

Wiregrass Medical Center  
Surgical or Procedure Consent

I authorize the performance upon myself \_\_\_\_\_ for the  
following operation Right elbow ulnar nerve transposition

(State nature and effects of operation)  
to be performed under the direction of Dr. Beranek.

I consent to the performance of operations and procedures in addition to or different from those now contemplated, whether or not arising from, presently unforeseen conditions, which the above named doctor or his associates may consider necessary or advisable in the course of the operation.

It has been explained to me by my physician and I understand there is a potential risk of excessive blood loss due to the nature of my surgery and a possibility that I may need to receive blood or blood products. It is understood and agreed that the attending physician or his assistants will be responsible only for the performance of their own individual professional acts, and that the blood typing and selection of compatible blood are the responsibilities of those who actually perform the necessary laboratory test. My doctor has explained and I understand that there are potential risks from blood transfusion and that some of these include transfusion reaction, hepatitis, blood impairments and Acquired Immune Deficiency Syndrome. My doctor has explained the risks and benefits of the blood transfusion, advised me of alternative treatments and has told me the expected outcome and what happens if my condition remains untreated.

I give consent to receive blood or blood products as determined by my doctor to be necessary for my well being.  YES  NO  ONLY AS AN EMERGENCY LIFE SAVING MEASURE

For the purpose of advancing medical education, I consent to the admittance of observers to the Operating Room.  YES  NO

I consent to non-identifying photographs to be taken for medical record purposes.  
 YES  NO

I consent to the disposal, by hospital authorities, of any tissue or parts, which may be removed.

I am aware that sterility may result from this operation. I know that a sterile person is incapable of becoming a parent. (APPLICABLE NON-APPLICABLE)

The nature and purpose of the operation, possible alternative methods of treatment, the risks and benefits involved, and the possibility of complications have been fully explained to me. No guarantee or assurance has been given by anyone as the results that may be obtained.

Date/Time: 10/17/03 1550 Signed: Christopher Johnson

Patient or person authorized to consent for patient  
Witness: Micheal Collins Jr. Relationship to patient: \_\_\_\_\_

I have counseled this patient as to the nature of the proposed procedure(s); attendant risks involved, and expected results as described above.

Dosey  
Surgeon Obtaining Consent



WIREGRASS MEDICAL CENTER  
GENEVA, ALABAMA

SARITA CRYSTAL D O/P  
471251 FITCHUM O D MD  
DOB-03/09/70 33 MALE  
00/00/00

OP-SURG

Addressograph

### CONSENT FOR ANESTHESIA SERVICES

I, Crystal Seaman, acknowledge that my doctor has explained to me that I will have an operation, diagnostic or treatment procedure. My doctor has explained the risks of the procedure, advised me of alternative treatments and told me about the expected outcome and what could happen if my condition remains untreated. I also understand that anesthesia services are needed so that my doctor can perform the operation or procedure.

**It has been explained to me that all forms of anesthesia involve some risks and that no guarantees or promises can be made concerning the results of my procedure or treatment. Although rare, unexpected severe complications with anesthesia can occur and include the remote possibility of infection, bleeding, drug reactions, blood clots, loss of sensation, loss of limb function, paralysis, stroke, brain damage, heart attack or death.** I understand that these risks apply to all forms of anesthesia and that additional or specific risks have been identified on the back of this form. I understand that the type(s) of anesthesia service checked will be used for my procedure and that the anesthetic technique to be used is determined by many factors including my physical condition, the type of procedure my doctor is to do, his or her preference, as well as my own desire. It has been explained to me that sometimes an anesthesia technique which involves the use of local anesthetics, with or without sedation, may not succeed completely and therefore another technique may have to be used including general anesthesia.



<input type="checkbox"/> General Anesthesia	Expected Result	Total unconscious state, possible placement of a tube into the windpipe.
	Technique	Drug injected into the bloodstream; breathed into the lungs, or by other routes.
	Risks	Mouth/throat pain, hoarseness, injury to mouth or teeth, awareness under anesthesia, injury to blood vessels, aspiration, pneumonia.
<input type="checkbox"/> Spinal or Epidural Analgesia/Anesthesia	Expected Result	Temporary decreased or loss of feeling and/or movement to lower part of body.
	Technique	Drug injected through a needle/catheter placed either directly into the spinal canal or immediately outside the spinal canal.
	Risks	Headache, backache, buzzing in the ears, convulsions, infection, persistent weakness, numbness, residual pain, injury to blood vessels, "total spinal"
<input checked="" type="checkbox"/> Major/Minor Nerve Block	Expected Result	Temporary loss of feeling and/or movement of a specific limb or area.
	Technique	Drug injected near nerves providing loss of sensation to the area of the operation.
	Risks	Infection, convulsions, weakness, persistent numbness, residual pain, injury to blood vessels.
<input type="checkbox"/> Intravenous Regional With Sedation Without Sedation	Expected Result	Temporary loss of feeling and/or movement of a limb.
	Technique	Drug injected into veins of arm or leg while using a tourniquet.
	Risks	Infection, convulsions, persistent numbness, residual pain, injury to blood vessels.
<input checked="" type="checkbox"/> Monitored Anesthesia Care (with sedation)	Expected Result	Reduced anxiety and pain, partial or total amnesia.
	Technique	Drug injected into the bloodstream, breathed into the lungs or by other routes producing a semi-conscious state.
	Risks	An unconscious state, depressed breathing, injury to blood vessels.
<input type="checkbox"/> Monitored Anesthesia Care (without sedation)	Expected Result	Measurement of vital signs, availability of anesthesia provider for further intervention.
	Technique	None.
	Risks	Increased awareness, anxiety and/or discomfort.

I hereby consent to the anesthesia service checked above and authorize that it be administered by Yvonne Tucker CRNA Frank Van Landingham CRNA or his/her associates, all of whom are credentialed to provide anesthesia service at this Hospital. I also consent to an alternative type of anesthesia, if necessary, as deemed appropriate by them. I expressly desire the following considerations to be observed (or write "none").

I certify and acknowledge that I have read this form or had it read to me, that I understand the risks, alternatives and expected results of the anesthesia service and that I had ample time to ask questions and to consider my decision.

Dale L. Hoffman  
Patient's Signature

12-17-03 1550  
Date and Time

Substitute's Signature

Relationship to Patient

Marcia Bellamy

Frank Van Landingham

Witness

# ADVANCE DIRECTIVE ACKNOWLEDGEMENT

NAME: Crystal D. Scanlon SOC. SEC. NO: 236150086  
IDENTIFICATION NO: 479251 DATE OF BIRTH: 3-9-1978

## PLEASE READ THE FOLLOWING FOUR STATEMENTS.

1. I have been given written materials about my right to accept or refuse medical treatments
2. I have been informed of my rights to formulate Advance Directives.
3. I understand that I am not required to have an Advance Directive in order to receive medical treatment at this health care facility.
4. I understand that the terms of any Advance Directive that I have executed will be followed by the health care facility and my caregivers to the extent permitted by law.

## PLEASE CHECK ONE OF THE FOLLOWING STATEMENTS:

I HAVE executed an Advance Directive.

I HAVE NOT executed an Advance Directive.

Signed Crystal Scanlon Date: 12-17-03

Witness: \_\_\_\_\_ Date: \_\_\_\_\_

Witness: Mark Bates Date: 12-17-03

## Wiregrass Medical Center

## Pre-Operative Checklist

Date: 12/19/03Allergies: NKACRYSTAL P  
LIPSON G C NO.  
3/7/03 33 MALET 97<sup>2</sup> P 77 R 20 B/P 137/60 Wt 250 Time 0900 Initials ABIdentification band on: Yes / No   Addressograph with chart: /

Removed: Glasses /  
 Dentures /  
 Jewelry /  
 Nail Polish /

Chewing gum /  
 Bobby pins /  
 Contacts /  
 Prostheses /

Ted hose N/A (if ordered)

A.M. Care: Bath /  
 Care of hair /  
 NPO since midnight /

Oral hygiene /  
 Hospital gown on /  
 Void prior to pre-op /  
 Meds /  
 Time / Initials   

Care plan initiated: yesOperative permit signed and witnessed: yesSite/Side of surgery identified: yesHistory and Physical on chart:   

Laboratory results on chart:

UA	PT/PTT
HGB	<u>13.4</u>
Type and	HCT
Crossmatch	<u>38.9</u>
Other	

Chest X-ray on chart:   EKG on chart:    PO

Pre-op medications given: Benadryl, 100 mg PO 0900 AB  
 Medication Time Nurse  
Keflex 20 mg PO 0900 AB  
 Medication Time Nurse  
Pectenix 46 mg PO 0900 AB  
 Medication Time Nurse  
Hnpef + fgm (WAM) 0930 153  
 Medication Time Nurse  
    
 Medication Time Nurse

Operative area prepped by:   Operative area checked by:   , RNPre-op teaching done: yesCharge Nurse: U. D. Dugan RN CNOR

Plumber No. 5113

PLAINTIFF'S  
EXHIBIT  
15bb

#12136  
no f/u

# DAVID J. HARRISON

ATTORNEY AT LAW

600 West Magnolia • Post Office Box 994 • Geneva, Alabama 36340 • Phone (334) 684-8729

May 19, 2004

Dr. Steven Beranek  
Wiregrass Orthopaedics, P.C.  
P.O. Box 311345  
Enterprise, Alabama 36331

Re: Crystal Seaman  
SS# 236-15-0086

Dear Dr. Beranek:

I have received the medical records your office forwarded to me on the above-referenced individual, and thank you for the same.

I have a special request of you. I did not notice in any of your notes in these records that you believe that Ms. Seaman's injury is related to anything other than her fall at the Food Giant. If you would, please let me know if you believe that her injury is solely due to the fall. I will, of course, be taking your deposition at a later date; however, before I proceed this is a question I need answered.

I appreciate your time and consideration of this matter, and look forward to hearing from you soon.

Sincerely,

David J. Harrison  
Attorney at Law  
DJH/trh

DRB

I believe her ulnar neuropathy  
is solely due to her injury/fall

AS soon  
6/24/2004

Stacked briefs 4:30 pm



OPERATIVE REPORT

Patient Name: SEAMAN CRYSTAL D	Number: 479251	Admit Date: 00/00/00
Sex: M Age: 33	Med Record: 236150086 MR	Disc. Date: 00/00/00
Date of Birth: 03/09/1970	Type: O/P Room#:	Physician: MITCHUM O D MD
		Physician Number: 000700

DATE OF PROCEDURE: 12/19/03

PREOPERATIVE DIAGNOSIS: RIGHT ELBOW ULNAR NEUROPATHY

POSTOPERATIVE DIAGNOSIS: SAME

OPERATIVE PROCEDURE: RIGHT ELBOW ULNAR NERVE TRANSPOSITION

SURGEON: STEVE BERANEK, M.D.

ANESTHESIA: GENERAL ANESTHETIC; FRANK VANLANDINGHAM; CRNA

BLOOD LOSS: MINIMAL

TOURNIQUET TIME: 45 MINUTES AT 210 MILLIMETERS OF MERCURY

FLUIDS: A LITER OF PLASMALYTE

INDICATIONS: ADULT WHITE FEMALE WITH ELECTRODIAGNOSTIC RIGHT ELBOW ULNAR NEUROPATHY, WHO PRESENTS FOR ULNAR NERVE TRANSPOSITION.

DESCRIPTION OF PROCEDURE: FOLLOWING ADEQUATE GENERAL ANESTHETIC, THE RIGHT ARM WAS PREPPED WITH DURAPREP AND DRAPED IN THE USUAL STERILE FASHION. THE TOURNIQUET AT THE BICEP WAS INFLATED AT 210 MM OF MERCURY. A 4 INCH INCISION WAS PLACED ALONG THE POSTERIOR BORDER OF THE ELBOW. THE SUBCUTANEOUS TISSUES WERE DISSECTED DOWN TO THE ULNAR NERVE PROXIMALLY. IT WAS EASILY IDENTIFIED. AS IT WAS FOLLOWED UP INTO THE ARM, TO THE LIGAMENTOUS STRUTHERS IT WAS NOTED TO BE QUITE TIGHT. THIS WAS FREED. THE NERVE WAS THEN CIRCUMFERENTIALLY FREED DISTALLY ALL THE WAY TO THE INSERTION AT THE FLEXOR DIGITORUM PROFUNDUS MUSCLE. IT WAS THEN TRANSPOSED ANTERIORLY INTO THE SUBCUTANEOUS AREA AND THEN THE FATTY TISSUE WAS SEWN OVER THE COMMON FLEXOR ORIGIN WITH 2-0 VICRYL SUTURE. THE NERVE WAS NOTED TO BE FREE AND FLOW THROUGH THIS LITTLE TUNNEL WITHOUT DIFFICULTY. THERE WAS AN ADDITIONAL SUPERFICIAL NERVE WHICH WAS TRANSECTED IN THE DISSECTION WHICH WAS REPAIRED WITH A SINGLE 4-0 NYLON SUTURE. THE SKIN WAS CLOSED WITH SUBCUTANEOUS 2-0 VICRYL SUTURE, SUBCUTICULAR 2-0 VICRYL SUTURE AND THEN REINFORCED WITH STERI-STRIIPS. A STERILE NON OCCLUSIVE DRESSING WAS APPLIED, THE TOURNIQUET DEFLATED AND HER FINGERS PINCHED UP NICELY. SHE WAS TAKEN TO OUTPATIENT RECOVERY IN GOOD CONDITION.

STEVE BERANEK, M.D.  
DATE DICTATED: 12/19/03  
DATE TYPED: 12/19/03/11:13 A.M./md

